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September 11, 2019

VIA ECF

Honorable Joel Schneider
United States Magistrate Judge
U.S. District Court - District of New Jersey
Mitchell S. Cohen Building & US Courthouse
1 John F. Gerry Plaza, Courtroom 3C
4th and Cooper Streets
Camden, New Jersey 08101

Re: IN RE: VALSARTAN N-NITROSODIMETHYLAMINE (NDMA) PRODUCTS
LIABILITY LITIGATION
Civil No. 19-2875 (RBK/JS)

Dear Judge Schneider:

Pursuant to the Court's instructions, please accept this letter on behalf of Plaintiffs in advance of the September 12, 2019 telephonic status conference scheduled for 4:00 p.m.

1. Plaintiff Fact Sheets:

The personal injury PFS is nearly complete. Plaintiffs will be prepared to discuss the few remaining issues, if any, during the call. Plaintiffs are awaiting revised economic/class representative PFSs, with the intention to have all of the PFSs implemented pursuant to a single case management order at the same time.

2. Dismissal of Peripheral Defendants:

The proposed stipulations/orders are nearly complete, and it is expected that they will be ready to be submitted for entry shortly.

3. ANDA Productions:

Teva's counsel has met and conferred with Plaintiffs' counsel with regard to production of its ANDAs in eCTD format, and Plaintiffs' have agreed to the modification in production format proposed by Teva in order to reduce Teva's production burden and cost. No other counsel has produced or met and conferred with Plaintiffs' counsel regarding such production. We assume the lack of meet and confer requests means that the other defendants do not believe their production results in an undue burden or cost to them and are on track to produce their ANDAs in eCTD format by September 16, 2019, as ordered.

4. JPML Petition to Expand the MDL:

Plaintiffs filed a petition to expand the MDL on August 15, 2019. Plaintiffs also moved for an expedited hearing, to have the petition heard at the September 26, 2019 JPML hearing, but that motion has been denied.

5. Defendant Fact Sheets:

Plaintiffs served a proposed defendant fact sheet on Defendants on June 27, 2019 and are awaiting a response.

6. Service of Process Update:

Plaintiffs are not aware of any unserved foreign defendant being served since the last conference. Plaintiffs have sent service waivers to the remaining unserved U.S. defendants, and defendants have been returning the signed waivers. Plaintiffs also requested and received writs of

summons from the Clerk's Office last week, to effectuate service on a small number of domestic defendants which have yet to have counsel appear in the MDL.

Plaintiffs also expect that the agreement previously reached with Torrent regarding service on Torrent Pharmaceuticals, Ltd. will be effectuated in the near future.

7. Addition of Mylan, NV to the Short Form Complaint:

Plaintiffs request the addition of Mylan, N.V. to the Short Form Complaint.

Please advise if Your Honor requires anything else prior to the conference.

Respectfully,



ADAM M. SLATER

AMS/lat

cc: Seth Goldberg, Esq. (via email)